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REMARKS

1. Applicant thanks the Examiner for his courtesy and helpfulness during an Interview which was held on Friday, 11 August 2006. During the Interview, the Examiner suggested that Applicant focus on those aspects of the invention that were not present in the prior art Triad System. In this regard, Applicant has cancelled Claim 1 and provides herewith a new Claim 31 written in this manner. By canceling Claim 1, as well as the other independent claims pending in the application, Applicant avoids the Examiner's rejection with regard to 35 USC 112.

2. With regard to the rejection for obviousness under 35 USC 103, Applicant does not dispute that the Triad System is prior art. Applicant describes the Triad system in the application as such. For example at the very beginning of the description appearing on page 1 Applicant notes that "the leading account management system is the TRIAD system..." Applicant also points out in the description of the prior art that "such account management systems currently available require significant internal resources of an end user before they can be integrated into the end user's legacy information management systems." During the referenced interview, the Examiner queried whether the invention was merely the placing of a server application onto the Internet for access by a client. In this regard, the Examiner has combined the prior art TRIAD system with the Ratnaraj reference.

Unfortunately, the combination of Ratnaraj with the TRIAD system would not produce the claimed invention. Ratnaraj provides a system for accessing a database via the Internet using a World Wide Web server. However, the point of the invention is not to provide a web interface to a mainframe application, such as a database and search engine, for example as taught by Ratnaraj. Rather, the invention divides the work between a server and a client without overburdening the client and without requiring a restructuring of the server.

Ratnaraj would only teach a person skilled in the art how to access a database or other such server application with a web browser. The web browser, being a thin client, performs no function other than exchanging HTML, Javascript, and the like with the web server at a gateway. In such system, data in the database are converted to a common format that allows the search engine to access the information and provide it via the world wide web server to a browser. Such system would not work with the TRIAD product because the task to be accomplished with the prior art TRIAD system is not to put a web front end onto it to allow browser access, but to distribute the need to perform various processing tasks, for example through the use of applications at a client end, and through the use of an account management system at the server end. The client and server in such system must operate seamlessly and yet must cooperate and perform a complex tasks at both ends.

One way the invention solves this problem is to provide a mechanism in the server that allows the account management system, to operate as it might normally operate. For example, in the case of the TRIAD product, the TRIAD system would operate as it normally does. The invention reserves the space on the server that is seen by the account management system as a local file. The invention must provide a way to allocate data areas in the host system to which information may be written and from which written information may be read during the exchange of information between the host system and the client system. The invention accomplishes this by means of a calling program. For example, please see page 6, line 31 to page 8, line 5. Because all of the management processing is performed by the account management system, the calling program must readily provide information to the account management system and must receive information from the account management system to provide to the client system. The client system must also provide a graphical front end to the both the account management system and to various applications that are resident at, or accessed from, the client system. Thus, the client system and calling program must cooperate in a way that allows the end

user the ability to use both local resources, such as the above mentioned applications and to use the account management system as well. By offloading the processing for account management functions to a server, the local client system need not be encumbered with a complex analytic system, the invention allows the exploitation of computability and storage facility of the client in connection with applications and local data processing in connection with the presentation of information supplied by the account management system, for example through the graphical user interface.

A *prima facie* case of obviousness must provide motivation to combine the references. The acknowledged prior art TRIAD system is a stand alone system and there would be no motivation within the system itself to extend the system in a distributed manner, as taught in the present invention. Thus, one familiar with the TRIAD system would not be motivated to provide a manner of distributing processing across a network.

The Ratnaraj teaching refers to providing a web server to a legacy database. Ratnaraj is concerned with converting legacy data to a common format that is searchable by the web server, such that a user may access the database with a browser. There is nothing in Ratnaraj that would motivate a person skilled in the art to split up the processing requirements for an account management system between a server which does the account management processing and a client which performs local applications and provides a graphical user interface. Further, the fact that a legacy database can be converted to a common format and which can be search by a world wide web server does not provide motivation for one to construct a calling program. The purpose of the Ratnaraj invention is to convert data to a common format such that it is searchable. The calling program does not do this. Rather, the calling program insinuates itself into the data structure of the account management system, such that the account management system operates as it normally operates in a mainframe environment. For example, the account management system uses its local file

structure for reading and writing information that might be used by the client. The calling program provides a conduit between the account management system and the client system, such that the data area allocated on the host system appears to be locally accessible to the client and, thus, the client distinctively and seamlessly interacts with the account management system. Ratnaraj provides no motivation for solving the problem of integrating a client application in a management system with a server based management system, where the processing is performed by the server based management system, and where the client system provides a graphic user interface which allows interaction both with the account management system and with various applications that process information passed between the account management system and the client system.

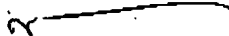
A *prima facie* case of obviousness must also show that there would be success when the proposed combination is effected. One skilled in the art would not know how to combine the prior art TRIAD system with a legacy database web interface to produce the claimed invention. While the prior art combination of TRIAD and Ratnaraj would seem an interesting combination on the surface, one skilled in the art would have no understanding how to take a world wide web interface for legacy database and use it to operate a highly complex account management system, such as the TRIAD system. For example, a world wide web server does not operate upon an account management systems local files. Rather, it accesses data through a communication facility. In the claimed invention, the account management system does not communicate in a classic sense with the client. Rather, the account management system operates on its local files, so it is the job of the calling program to take the information from the account management system and provide it to the client system and vice versa. The combination of TRIAD and Ratnaraj would not successfully produce a system like this.

Finally a *prima facie* showing of obviousness must provide a teaching for each and every element of the claimed combination. Applicant respectfully submits that none of the elements of the claimed invention are suggested by the combination, with the exception of the acknowledged prior art TRIAD system. In this regard, the client management system can be in fact the TRIAD system. Uniquely, the invention provides a facility by which the account management system, for example the TRIAD system, operates upon its local data resources and it is able to be controlled by and accessed by a client system. Again, the provision of the calling program makes this possible.

In view of the foregoing, the claims are deemed to be patentably distinct from the Examiner's proposed combination references. Accordingly, applicant respectfully requests that the Examiner withdraw his rejections and issue a Notice of Allowance such that the applicant's invention may be protected by US Letters Patent.

Should the Examiner deem it helpful, he is encouraged to contact Applicant's attorney, Michael A Glenn at (650) 474-8400.

Respectfully submitted,



Michael A. Glenn

Reg. No. 30,176

Customer No. 22, 862